

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

DONNA GARBACCIO, individually )  
and on behalf of all others similarly )  
situated, ) Civil Action  
)  
Plaintiff, ) No. 2:16-cv-02740(JMV)(JBC)  
)  
v. ) Honorable John Michael Vazquez  
) United States District Judge  
ST. JOSEPH’S HOSPITAL AND )  
MEDICAL CENTER AND )  
SUBSIDIARIES, *et al.*, ) Honorable James B. Clark  
) United States Magistrate Judge  
Defendants. )  
) CLASS ACTION

**PLAINTIFFS' UNOPPOSED MOTION FOR  
APPROVAL OF ATTORNEYS' FEES, REIMBURSEMENT OF  
EXPENSES AND FOR INCENTIVE AWARDS TO NAMED PLAINTIFFS**

Plaintiffs Donna Garbaccio, Mary Lynne Barker, Anne Marie Dalio, and Dorothy Flar (“Named Plaintiffs”) respectfully move the Court for an Order: (i) approving the negotiated attorneys’ fees and expenses to their attorneys Cohen Milstein Sellers & Toll, PLLC and Keller Rohrback, L.L.P. (“Class Counsel”),<sup>1</sup> and (ii) granting incentive awards to themselves as class representatives.

Accordingly, for the reasons fully set forth in the accompanying

<sup>1</sup> The request for attorneys' fees is also made on behalf of other plaintiffs' counsel Kessler Topaz Meltzer & Check, L.L.P., and Izard Kindall & Raabe, L.L.P.

Memorandum, Plaintiffs respectfully ask that the Court GRANT Plaintiffs' Motion and approve \$2,500,000 for the payment of attorneys' fees and expenses, and incentive awards of \$10,000 to each of the four Named Plaintiffs.

Dated: January 19, 2018

Respectfully submitted,

/s/ Scott M. Lempert

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***Counsel for Plaintiff Garbaccio***

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 19, 2018, I electronically filed the Unopposed Motion For Approval Of Attorneys' Fees, Reimbursement Of Expenses And For Incentive Awards To Named Plaintiffs with the Clerk of Court using the ECF filing system which in turn sent notice to all counsel of record.

/s/ Scott M. Lempert  
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